

VLADECK, RASKIN & CLARK, P.C.

SUSAN J. WALSH
212-403-7300
SWALSH@VLADECK.COM

September 15, 2016

Via ECF and Fax

Hon. Robert W. Sweet
US District Judge for the
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Knights 13 Cr 795 (RWS)

Dear Judge Sweet:

I am writing to respectfully request an adjournment of the trial of United States v. Ryan Knights with the consent of the Government. The trial is currently scheduled for October 24, 2016 and I am requesting an adjournment until December 5th (or January 30, 2017 or any date thereafter).

I am currently on trial in another matter and learned yesterday that the Government may file a superseding indictment but, what is more, they intend to reproduce many thousands of pages of discovery for the first time with bates numbers. I have been preparing this case with the coordinating assistance of others using documents that were not bates stamped previously by the Government. This new production will complicate and likely confuse trial preparation in this mortgage fraud case that consists of many thousands of pages of banking and housing documents. In short, it will take longer to prepare adequately and effectively.

Given that I am currently on trial in another matter for several weeks and other press of business, I respectfully request that either a pre-trial conference date be set at the end of the month to set a new trial date or, in the alternative, that a trial date be set for December 5th (or after January 30th) at the convenience of the court. My client is at liberty on bail and we, of course, consent to the exclusion of time under the Speedy Trial Act.

Respectfully submitted,

Susan J. Walsh /kjs
Susan J. Walsh

SJW:kds

cc Elizabeth Hanft, AUSA (via email)

778315 v1

